Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of	)	
	)	
Federal Communications Commission	)	GN Docket No. 25-133
Seeks Comment on	)	
In Re: Delete, Delete, Delete	)	
Public Notice	)	

COMMENTS OF GPS INNOVATION ALLIANCE

The GPS Innovation Alliance ("GPSIA")[1] appreciates the opportunity to comment on subjects of importance in this proceeding.[2] We highlight two opportunities for the Federal Communications Commission ("Commission") to alleviate unnecessary regulatory burdens. Deleting these requirements will pave the way for American firms to maintain U.S. leadership in position, navigation, and timing (PNT) technologies and services and unleash innovative products and services to consumers around the globe:

1. Eliminate Section 25.115(b)(i) and modify Section 25.115(b)(ii) with respect to devices and their associated processes for obtaining U.S. market access for non-U.S. licensed Radio Navigation Satellite Systems (RNSS) to be consistent with President Trump's Executive Orders and PNT policies; and
2. Continue to streamline the satellite licensing process.

GPSIA has long noted[3] that the existing requirement for users to obtain authorization to access foreign PNT/Global Navigation Satellite System (GNSS) constellations is unnecessary and the process for those providers to obtain U.S. market access is needlessly complex, and does not reflect existing technologies, commercial, and competitive realities.[4] Put simply, U.S. regulation of devices that merely receive foreign GNSS signals has not kept pace with rapidly

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1/ GPSIA promotes GPS, other GNSS, complementary space-based PNT satellite systems, and their receivers and devices. GPSIA is firmly committed to protecting these systems from harmful interference. We champion innovation, creativity, and entrepreneurship, which bolster the vital contributions of GPS, GNSS, and PNT technologies to public safety, critical infrastructure, and the global economy.

2 *See In Re: Delete. Delete, Delete*, Public Notice, DA 25-219 (rel. Mar. 12, 2025) (*Public Notice*).

3/ *See* Comments of GPSIA, IB Docket No. 17-16, 13-19 (filed Feb. 21, 2017).

4/ *See* "GPSIA Statement on Foreign GNSS Satellite Signals used in Receivers" (Mar. 19, 2024), *available at* https://www.gpsalliance.org/newsroom/gpsia-statement-foreign-gnss-satellites (last visited Apr. 4, 2025).

evolving GNSS technology, which has become truly ubiquitous. GNSS technologies are an integral part of modern life—enabling turn-by-turn navigation, precision agriculture, weather forecasting, and many other applications Americans depend on every day.[5] The Commission's rules, which date from the 1970s, were enacted when satellite "earth stations" were all large gateway "dishes" used to receive video programming or communications signals to support communications services.[6] The Commission could not have contemplated at that time that some "earth stations" would one day fit into a pocket. Yet today, satellite earth stations include smartphones, watches, tablets, and many other consumer devices. The imperatives for the FCC's rules may perhaps still apply to some space-based transmissions, but not to GNSS signals received and used by everyday devices.

It is now time for the Commission's rules to more closely adhere to the text and spirit of President Trump's Executive Order[7] and his 2021 Space Policy Directive[8] policy with respect to foreign space-based PNT. In particular, the requirement to obtain FCC approval of receipt of foreign one-way PNT/GNSS signals—if in fact it applies to receive-only receipt of such signals—should be removed altogether.

Changes in, or other Implications of, the Governing Legal Framework, Apply

The FCC's rules regarding receipt of non-U.S. satellite signals date back decades.[9] These rules were intended to address technical considerations (*e.g.*, "interfer[ence] with … U.S. downlink transmissions") and competitive concerns (*e.g.*, access to the United States for satellites from countries that refused to offer "equivalent competitive opportunities" in overseas markets)[10] that are a poor fit for GNSS receiver operations.

President Trump has directed administrative agencies such as the Commission to alleviate "unnecessary regulatory burdens" in the spirit of making the nation's legal framework more efficient. The Commission agrees that its rules and implementing actions should "…facilitate and

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5 *See* GPSIA Innovation Alliance, GPS In Action, https://www.gpsalliance.org/apps-1 (last visited Apr. 7, 2025).

6/ *See* Comprehensive Review of Licensing and Operating Rules for Satellite Services, Second Report and Order, 30 FCC Rcd 14713 (2015) (Statement of Commissioner Ajit Pai) (discussing how the Commission's Part 25 rules are outdated, as initial drafting of the rules dates back to the 1960s).

7/ *See* Executive Order 14192, "Unleashing Prosperity Through Deregulation." (Jan. 31, 2025), *available at* https://www.federalregister.gov/documents/2025/02/06/2025-02345/unleashing-prosperity-through-deregulation (last visited Apr. 4, 2025).

8/ *See* Memorandum on Space Policy Directive – 7, The United States Space-Based Position, Navigation and Timing Technology (Jan.15, 2021), *available at* https://trumpwhitehouse.archives.gov/presidential-actions/memorandum-space-policy-directive-7/ (last visited Apr. 3, 2025) ("SPD-7").

9 *See, e.g.*, *Regulation of Domestic Receive-Only Satellite Earth Stations*, First Report and Order, CC Docket No. 78-374, 74 FCC 2d 205 (1979).

10 *Amendment of the Commission's Regulatory Policies to Allow Non-U.S. Licensed Space Stations to Provide Domestic and International Satellite Service in the United States et al.*, Report and Order, 12 FCC Rcd. 24094, 24177 ¶ 201 (1997) ("*DISCO II Order*").

encourage American firms' investment in modernizing their networks, developing infrastructure, and offering innovative in advanced capabilities."[11] Today's rules governing the receipt of foreign PNT/GNSS signals fail to reflect modern realities and could undermine achievement of key public interest goals.

Today's Rules and Processes are Outdated and Insufficiently Agile for the Current Pace of Innovation

Even if the rule that requires GNSS receive-only devices to be authorized to receive foreign GNSS signals is retained (which it should not), the process by which foreign operators are approved for market access (thereby eliminating the end-user authorization requirement) should be streamlined. The Commission issued a Public Notice on March 15, 2011[12] that outlined the process by which it would permit non-Federal devices to receive certain signals from non-U.S. licensed Radio Navigation Satellite Systems.

The Commission, the National Telecommunications and Information Administration and the U.S. State Department further created a process[13] through which government operators of foreign satellite constellations can seek authority for devices in the U.S. to receive their signals. However, that process must be initiated by the foreign government itself (as opposed to companies or individuals), with concurrence from the State Department, resulting in a request for the FCC to waive its rules to allow reception of those foreign satellite signals.

The lengthy timeline for the U.S. Government that was required before devices receive certain Galileo RNSS signals illustrates why this process does not meet the rigorous standards set forth by President Trump in his Executive Orders. The total time for approval spanned more than a decade. The process began when the 2004 US/EU GPS-Galileo Agreement[14] was signed and finally concluded 14 years later with the FCC granting a waiver[15] for certain Galileo signals

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11/ *Delete Public Notice* at 1.

12/ *See National Telecommunications and Information Administration Provides Information Concerning Executive Branch Recommendations for Waiver of Part 25 Rules Concerning Licensing of Receive-Only Earth Stations Operating with Non-U.S. Radio Navigation Satellite Systems,* Public Notice, 26 FCC Rcd 3867 (2011).

13/ *See Galileo Public Notice,* Attach. Letter from Paul Weissenberg, Deputy Director-General, EC Enterprise and Industry Directorate-General, to Jonathan Margolis, Deputy Assistant Secretary, Bureau of Oceans and International Environmental and Scientific Affairs, U.S. Department of State (Oct. 23, 2013) (EC October 2013 Letter), 32 FCC Rcd. at 8243 (requesting a "block exemption" without limitation, of the FCC licensing requirement).

14/ *See* Agreement on the Promotion, Provision and Use of Galileo and GPS Satellite-Based Navigation Systems and Related Applications ("2004 EU/US Galileo-GPS Agreement") (June 26, 2004), *available at* http://www.gps.gov/policy/cooperation/europe/2004/gps-galileo-agreement.pdf. This agreement provides a framework for cooperation between the EC (the executive arm of the European Union) and the United States in the promotion, provision, and use of civil GPS and Galileo navigation and timing signals and services, value-added services, augmentations, and global navigation and timing goods.

15/ *See* Federal Communications Commission, *Waiver of Part 25 Licensing Requirements for Receive-Only Earth Stations Operating with the Galileo Radionavigation-Satellite Service*, 33 FCC Rcd 11322 (2018).

in the United States. It is therefore not surprising that no foreign governments operating PNT/GNSS satellites have completed the process since, whether Japan's QZSS (whose signals reach Hawaii, and parts of Alaska and the Western United States), China's BeiDou, or Russia's GLONASS system. This de facto barrier to signal access undermines commercial competitiveness and places U.S. manufacturers at a disadvantage. In short, the process is untenable in today's highly competitive, fast paced global marketplace.

U.S. Receiver and Chipset Manufacturers Face a Highly Competitive Global Market Dominated by Multi-Constellation GNSS Receivers

U.S. receiver and chipset manufacturers face stiff competition from counterparts around the world. However, outdated Commission rules hold the possibility of hampering our global competitiveness. According to technology intelligence firm ABI Research,[16] 87% of the global receiver market supported three or more PNT/GNSS constellations in 2021. By 2026, 95% of the market will do so. With 6 billion GNSS devices in use today, the market continues to grow. By 2033, the EU Agency for the Space Programme estimates that over eight billion GNSS devices[17] will be in use across the world. Domestic manufacturers of receivers and chipsets would cede leadership and be at a significant disadvantage in the global market if the U.S. Government prohibits receipt of signals from certain foreign GNSS constellations.

President Trump's Policy Expresses U.S. Government Support for Using Foreign Space-based PNT Services

Space Policy Directive - 7[18] (SPD-7), issued by President Trump in 2021 and still in effect today, directs the United States government to encourage the development and use of foreign PNT/GNSS systems and highlights that doing so will bring performance benefits to consumers:

> *The United States will continue to encourage the development of foreign space-based PNT services based on GPS and their responsible use in non-military applications with allied and likeminded nations. Use of multiple, varied PNT services can result in better performance in terms of user accuracy, availability, and resilience.*

The current process for the Commission to issue a waiver for foreign GNSS systems also is in significant tension with President Trump's policy. President Trump's Space Policy Directive expresses support for the use of foreign space-based PNT, but notes that, **"*the United States***

16/ Andrew Zignani, *What Technological Solutions Make High-Precision GNSS Possible*? (Sept. 8, 2022), *available at* https://www.abiresearch.com/blog/the-journey-to-high-precision-gnss (last visited Apr. 3, 2025).

17/ *See* EUSPA EO and GNSS Market Report (Volume 2, 2024), *available at* https://www.euspa.europa.eu/sites/default/files/euspa_market_report_2024.pdf (last visited Apr. 3, 2025).

18/ *See* SPD-7 Sec. 3.c.

Government does not assure the reliability or authenticity of foreign PNT services."[19] This policy recognizes the importance of system-level safeguards within receivers, many of which are designed and manufactured by U.S. firms, to ensure integrity regardless of signal source. The current process for Commission issuance of a waiver, by contrast, requires the federal government to make a contrary determination. In particular, the government must determine and communicate to the Commission that granting a waiver is in the public interest and consistent with trade and treaty guidelines, and that the foreign GNSS system's operations have been found to be compatible with U.S. government systems operating in specified RNSS bands. Such a determination implies a U.S. government imprimatur on the foreign GNSS system that would be inconsistent with the President's policy.

The Use of Foreign GNSS Does Not Incur Security Risks

Incorporating foreign GNSS signals into receivers delivers outstanding benefits to consumers without posing security risks.[20] Multiple GNSS systems improve receiver performance and enhance safety and security. Furthermore, as noted in a recent paper by experienced national security and PNT experts, any concerns that relying on foreign GNSS data may incur strategic, economic, and security concerns "collapse under scrutiny or disappear after employing measures intrinsic to GNSS design and architecture."[21]

The current rules are a solution in search of a problem and comprise just the type of regulation that President Trump has called for deleting. In particular, the Commission should eliminate the rules and the process to obtain the Commission's approval for "earth stations" to receive foreign one-way signals, particularly PNT/GNSS signals, if in fact they apply to receive-only receipt of such signals.[22] Taking this action also would be consistent with President Trump's recognition of the world-class technological and cybersecurity capabilities of U.S. PNT chipset, device, and receiver manufacturers:

> "*Although foreign space-based PNT services may be used to complement civil GPS service, receiver manufacturers should continue to improve security, integrity, and resilience in the face of growing cyber threats. Thus, incorporation of foreign PNT in multi-constellation devices should be designed in a manner that precludes potential degradation of essential user capabilities resulting from possible foreign global navigation satellite system (GNSS) origins. The United States will maintain awareness of*

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19 *Id*. (emphasis added).

20/ Dr. John Raquet and Mr. William "Terry" Burress, "More is More" (Feb. 2025), *available at* https://cdn.everythingrf.com/live/GNSS_White_Paper_REVISED_ws_15_638774632541279425.pdf (last visited Apr. 4, 2025).

21 *Id.* at 36.

22 *See generally* receive-only satellite earth station operator requirements in 47 C.F.R. §§ 25.115(b)(9)(licensing) and 25.137(a) (market access).

the risks and potential benefits associated with the use of foreign space-based PNT services and continue to promote and support the responsible use of GPS as the pre-eminent space-based PNT service."[23]

In short, the Commission should take this opportunity to ensure that its decades-old regulatory framework governing operation of receive-only satellite earth stations is applied in a sensible, limited way so Americans are able to benefit from access to multiple GNSS constellations.

The Commission Should Streamline Satellite Licensing

GPSIA applauds the efforts of the International Bureau and the Space Bureau throughout the years to rigorously examine and streamline satellite licensing regulations. With some analysts projecting that the global space economy could reach as high as $1 trillion dollars by 2030,[24] a tremendous opportunity exists for the United States to serve as the commercial satellite community's preferred licensing authority of choice – if the rules, processes, and costs of obtaining a license are efficient and affordable for operators of all sizes. A streamlined regulatory framework is essential for U.S. companies to compete effectively in this expanding global ecosystem. In particular, the costs to obtain a license must be affordable for early stage commercial space startups and competitive when compared with other well respected international licensing jurisdictions. As the President notes, "It is the policy of my Administration to significantly reduce the private expenditures required to comply with Federal Regulations to secure America's prosperity and national security…."[25] Streamlining the satellite licensing process and reducing fees will help achieve this important goal.

CONCLUSION

GPSIA urges the Commission to eliminate the outdated, unwieldy rules and processes pertaining to the receipt of signals from foreign PNT/GNSS systems and to continue to streamline the satellite licensing process to ensure that commercial space startups can quickly and affordably seek licenses to operate their systems. Only then will the Commission help realize the President's vision for American firms to maintain U.S. leadership in PNT technologies and services, while unleashing innovative products and services to consumers around the globe.

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[23] SPD-7 at Sec.3(c).

[24] *See* "The Trillion Dollar Question." (Apr. 18, 2024), *available at* https://spacenews.com/the-trillion-dollar-question/ (last visited Apr. 4, 2025).

[25] *See* Executive Order 14192 Sec. 1.

Respectfully submitted,

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